

EXHIBIT A

United States Fidelity & Guaranty Company's Pretrial Memorandum

EXHIBIT LIST

CASE NUMBER 1:01cv00813

Plaintiff	Defendant	Description of Item	Identified	Evidence	Ruling	Witness	Stipulation ¹
1.	Bonds - Bedford County, State Route 0030, Everett Borough, PA						Y
2.	Bonds - Cambria County State Route 22, PA						Y
3.	Bonds - Cool & Cold Aqua (Water Line), Kearneysville, WV						Y
4.	Bonds - Cool & Cold Aqua (National Center), Kearneysville, WV						Y
5.	Bonds - National Germplasm Quarantine Ctr, Laurel, MD						Y
6.	Bonds - James River Juvenile Detention Ctr, Beaumont, VA						Y
7.	Bonds - Outlook Pointe - Chesterfield, Richmond, VA						Y
8.	Bonds - Outlook Pointe - Westerville, OH						Y
9.	Bonds - PA Turnpike Commission Bldg, Harrisburg, PA						Y
10.	Bonds - Perry County - State Route 11, PA						Y
11.	Bonds - Scott Air Force Base, Belleville, IL						Y
12.	Bonds - Summerdale Center, Harrisburg, PA						Y
13.	Bonds - Virginia Commonwealth University (VCU) Life Sciences Bldg, Richmond, VA						Y
14.	Bond Summary - 1997						
15.	Bond Summary - 1998						
16.	Damage Summary and Backup - Bedford County, State Route 30, Everett Borough, PA						
17.	Damage Summary and Backup - Cambria County State Route 22, PA						
18.	Damage Summary and Backup - Cool & Cold Aqua (Water Line), Kearneysville, WV						
19.	Damage Summary and Backup - Cool & Cold Aqua (National Center), Kearneysville, WV						

¹ Stipulation as to authenticity unless otherwise indicated.

20.		Damage Summary and Backup - National Germplasm Quarantine Ctr, Laurel, MD		
21.		Damage Summary and Backup - James River Juvenile Detention Ctr, Beaumont, VA		
22.		Damage Summary and Backup - Outlook Pointe - Chesterfield, Richmond, VA		
23.		Damage Summary and Backup - Outlook Pointe - Westerville, OH		
24.		Damage Summary and Backup - PA Turnpike Commission Bldg., Harrisburg, PA		
25.		Damage Summary and Backup - Perry County - State Route 11, PA		
26.		Damage Summary and Backup - Scott Air Force Base, Belleville, IL		
27.		Damage Summary and Backup - Summerdale Center, Harrisburg, PA		
28.		Damage Summary and Backup - Virginia Commonwealth University (VCU) Life Sciences Bldg, Richmond, VA		
29.		Total Damage Summary		
30.		CCI Audited Financial Statement 1993		
31.		CCI Audited Financial Statement 1994		
32.		CCI Audited Financial Statement 1995		
33.		CCI Audited Financial Statement 1996		
34.		CCI Audited Financial Statement 1997		
35.		Transmittal letter from Dominian To USF&G Re. 1997 Audited Financial Statement, 3/5/98		
36.		CCI Audited Financial Statement 1998		
37.		Transmittal letter from Dominian To USF&G Re. 1998 Audited Financial Statement, 3/1/99		
38.		Brown Schultz Accounting and Auditing Quality Control Manual		
39.		Brown Schultz Manual		
40.		USF&G Contract Underwriting Manual		
41.		St. Paul Contract Underwriting Manual (8/99)		
42.		Horwath International Audit Manual (U.S. Version), 2000 Edition		
43.		Statement of Auditing Standards		
44.		Modification/Amount Sheet - List of Amendments to AICPA		

		Audit Guide	
45.		IRMI Expert Commentary - Surety Bonding Tactics Article, April 2002	
46.		IRMI Expert Commentary - Surety Bonding Tactics Article, January 2002	
47.		IRMI Expert Commentary - Surety Bonding Tactics Article, July 2002	
48.		IRMI Expert Commentary - Surety Bonding Tactics Article, October 2002	
49.		Brown Schultz Website Content -- Accounting and Auditing Contacts	Y
50.		Brown Schultz Website Content -- Bruce J. Brown	Y
51.		Brown Schultz Website Content -- About BSSF	Y
52.		4/4/75 USF&G Fidelity/Surety Department Circular (Grey Letter)	Y
53.		2/28/89 New Client Approval and Engagement and Form A-1	Y
54.		12/31/91 Memo From Shane Miller to Management/Operations Re. Bonus Program	Y
55.		12/31/91 - 2/29/94 Underwriters Summary Worksheet	Y
56.		11/19/92 Checklist for Assessing the Control Environment	Y
57.		12/22/92 PCIC Insurance License for Turks & Caicos Islands	
58.		12/22/92 Deposit Escrow Agreement	Y
59.		12/31/92 Remedial Work Period Insurance Policy	Y
60.		1/21/93 Letter from Roberts (Eckert Seamans) To Miller (Miller & Simons) with Attached PCIC Formal Undertaking	Y
61.		3/8/93 Extension of Services Agreement - PCIC	Y
62.		5/27/93 Letter from Wyatt To Milburn (Brown Schultz)	
63.		5/27/93 Fax from Petrowski (Wyatt) To Barber (CCI)	
64.		5/28/93 Fax from Barber (CCI) To Bruce Brown with Attached 5/27/93 Letter from Petrowski (Wyatt) To Milburn (Brown Schultz)	
65.		6/93 - The Captive Insurance Manual, Turks & Caicos	
66.		10/93 CCI Structure	Y
67.		10/14/93 Letter from Hetrick (Dauphin Deposit Bank) to Barber (CCI)	Y
68.		10/19/93 Letter from Miller (CCI) to Dominiani (Byerly)	Y

		with attached Heck Resume	
69.		11/2/93 Business Information Report Re. CCI	Y
70.		11/8/93 Information Review - Underwriting Questions	Y
71.		11/8/93 Underwriting Memorandum - Contract Bond	Y
72.		11/9/93 CCI Completed and Current Projects	Y
73.		11/9/93 Underwriting Summary - Contract Bonds	Y
74.		11/15/93 Letter from Shaw (Employers Reinsurance) to Huss (USFG)	Y
75.		11/16/93 Letter from Dominiani (Byerly) to Phillips (USFG)	Y
76.		11/17/93 Letter from Huss Re. Bids	Y
77.		12/8/93 PCIC Plan of Operations	Y
78.		12/8/93 Specific Discretionary Authority - National Account	Y
79.		12/9/93 Interoffice Correspondence from Daily to Phillips	Y
80.		12/31/93 - 12/31/95 Comparative Analysis of Financial Statements	Y
81.		12/31/93 - 6/30/98 Handwritten Notes	
82.		1994 - 1999 Bond List	Y
83.		3/23/94 Interoffice Correspondence from Salazar To Daily	Y
84.		3/28/94 Memorandum from Phillips (USFG) to Dominiani	Y
85.		6/6/94 Business Information Report Re. CCI	Y
86.		6/13/94 Memorandum from Salazar (USFG) to Dominiani	Y
87.		6/15/94 Memorandum from Phillips (USFG) to Huss	Y
88.		6/15/94 E-Mail from Daily To Salazar	Y
89.		7/1/94 Letter from Huss (USFG) to Ortenzio (CCI)	Y
90.		7/12/94 Interoffice Correspondence from Salazar To Daily	Y
91.		7/13/94 Interoffice Correspondence from Salazar to Daily	Y
92.		7/13/94 E-Mail from Daily To Huss, Salazar, Phillips	Y
93.		7/13/94 E-Mail from Salazar To Daily	Y
94.		7/13/94 E-Mail from Daily To Salazar	Y
95.		7/14/94 Interoffice Correspondence from Salazar to Dominiani	Y
96.		7/14/94 E-Mail from Daily To Salazar	Y
97.		7/14/94 E-Mail from Daily to Phillips	Y
98.		7/14/94 E-Mail from Phillips to Daily	Y
99.		7/19/94 Letter from Roberts (Eckert Seamans) to Barber	Y
100.		7/21/94 Letter from Dominiani (Byerly) To Salazar (USFG)	Y
101.		7/22/94 Specific Discretionary Authority - National Account	Y

133.		4/17/95 Memorandum from Salazar to Daily		
134.		5/1/95 Specific Discretionary Authority		
135.		5/1/95 Agent's Specific Contract Authority - Byerly		
136.		5/4/95 Fax from Petrowski (Watson Wyatt) To Barber with Attached 5/5/95 Memos from Petrowski (Watson Wyatt) To Barber (PCIC) and 12/31/94 Schedule of Remedial Work Policies and 12/31/94 Remedial Work Claim Reserve Calculation		
137.		5/12/95 Letter from Gordon (Watson Wyatt) To PCIC Board of Directors		
138.		7/25/95 Interoffice Memo from Salazar to Daily		
139.		8/29/95 Master Surety Agreement		
140.		10/19/95 CCI Written Consent of Shareholder in Lieu of Special Meeting		
141.		10/26/95 Note from Carolyn To Miller Re. Fax and Fed Ex Out Today		
142.		10/26/95 Fax from Gwartney (Watson Wyatt) To Phillips (CCI) With Attached 5/12/95 Letter from Gordon (Watson Wyatt) To PCIC Board of Directors and 12/31/94 PCIC Statement of Actuarial Opinion		
143.		11/29/95 Letter from Brown To Phillips		
144.		11/29/95 Client Information Record		
145.		Checklist for Consideration of Internal Control Components (Form B-2A)		
146.		11/30/95 Interoffice Memo from Salazar to Daily		
147.		12/31/95 Checklist for Evaluating the Level and Direction of Overall Inherent Risk, Form B-2		
148.		12/31/95 Checklist for Determining Materiality, Form B-3		
149.		12/31/95 Audit Planning Program. Form B-1		
150.		12/31/95 Requested Audit Schedules		
151.		12/31/95 Audit Program, Expenditure Cycle		
152.		12/31/95 Disclosure Requirements for Financial Statements of Nonpublic Businesses, Form CCX		
153.		12/31/95 Income Recognition		
154.		2/26/96 Letter from Gordon (Watson Wyatt) To PCIC Board of Directors		
155.		3/27/96 Letter from Diel (Watson Wyatt) To Phillips (CCI)		
156.		3/29/96 Interoffice Memo from Salazar To Phillips		

		Original Estimate Worksheet	
186.		1997 Restated Financial Statement	
187.		1/6/97 Letter from Brown (Brown Schultz) to Phillips (CCI)	
188.		1/9/97 Fax from Petrowski (Watson Wyatt) To Phillips (CCI) with Attached 1/9/97 Letter	
189.		3/31/97 Income Recognition	Y
190.		4/3/97 Detailed Work in Process	Y
191.		4/15/97 Letter from Schwartz (Dauphin Deposit Bank) to Phillips	Y
192.		4/29/97 Meeting Memo from Phillips To File	Y
193.		5/1/97 Specific Discretionary Authority Notice	Y
194.		5/1/97 Interoffice Correspondence from Salazar To Daily	Y
195.		6/2/97 Bond Request Re. Camp Fretterd Armory	Y
196.		7/24/97 Letter from Brown (Brown Schultz) To Phillips (CCI) with invoice attached	
197.		8/19/97 Interoffice Memo from Salazar To Daily with Attached 8/15/97 Letter from Dominiani (Byerly) To Phillips (USFG)	Y
198.		8/20/97 Financials Report - Balance Sheet	Y
199.		8/20/97 Financials Report - Income Statement	Y
200.		8/20/97 WIP Schedule Report with Attached 8/4/97 Detailed Work in Process - General Contracting	Y
201.		8/26/97 E-Mail from Daily to Salazar and Walter	Y
202.		8/27/97 CCI Written Consent of Shareholder in Lieu of Special Meeting	Y
203.		8/27/97 CCI Written Consent of Shareholder in Lieu of Special Meeting - Underlined with attached Spreadsheet	Y
204.		9/3/97 Bond Approval Re. McGuire AFB	Y
205.		9/5/97 Letter from Ortenzio (CCI) to Daily (USFG)	Y
206.		9/5/97 Letter from Ortenzio (CCI) to Phillips (USFG)	Y
207.		9/30/97 CCI Balance Sheet and Income Statement	Y
208.		10/3/97 Employment Agreement Between Miller and CCI	Y
209.		10/9/97 Letter from Dominiani (Byerly) to Ortenzio (CCI) Re. Bonding Requirements	
210.		10/10/97 Interoffice Memo from Daily To Salazar with Attached 9/5/97 Letter from Ortenzio (CCI) To Daily (USFG) and Master Surety Agreement	Y
211.		11/7/97 Letter from Dominiani (Byerly) To Ortenzio (CCI)	

212.		11/7/97 Letter from Brown (Brown Schultz) To Phillips (CCI) with attached 11/7/97 Invoice		
213.		1997 Audit Work Papers		Y
214.		12/11/97 Evaluation for Corrine Rebinski Re. Ortenzio with Performance Appraisal		
215.		12/18/97 Financials Report - Balance Sheet		Y
216.		12/18/97 Financials Report - Income Statement		Y
217.		12/18/97 WIP Schedule Report with Attached 12/1/97 Detailed Work in Process - General Contracting		Y
218.		12/31/97 Semi-Annual Performance Summary and Career Counseling with Attached Performance Appraisals - Corrine Rebinski		
219.		12/31/97 Requested Audit Schedules		
220.		12/31/97 Guide for Review of Workpapers Under U.S. Auditing Standards		
221.		1998 Restated Financial Statement		Y
222.		1998 Audit Work Papers		
223.		1998 John Ortenzio's Corporate and Partnership Interests		Y
224.		3/23/98 Financials Report - Balance Sheet		Y
225.		3/23/98 Financials Report - Income Statement		Y
226.		3/23/98 Financials Report - WIP Schedule Report		Y
227.		4/15/98 Financials Report - Balance Sheet		Y
228.		4/15/98 Financials Report - Income Statement		Y
229.		4/15/98 Interoffice Correspondence from Salazar To Daily Phillips (CCI)		Y
230.		4/20/98 Letter from Schwartz (Dauphin Deposit Bank) To Phillips (CCI)		Y
231.		4/28/98 Memo from Phillips (USFG) to File (CCI)		Y
232.		4/29/98 Letter from Brown (Brown Schultz) To Phillips (CCI)		
233.		5/8/98 Letter from Swartzmiller (CCI) to Treffinger (Scholl, Sowers)		
234.		5/15/98 Letter from Dominiani (DJL) to Phillips (USFG)		Y
235.		6/4/98 Letter from Swartzmiller (CCI) To Treffinger (Scholl, Sowers)		
236.		6/30/98 Income Statement		
237.		8/17/98 Letter from Dominiani (DJL) to Phillips (USFG) with handwriting		Y
238.		8/17/98 Letter from Dominiani (DJL) to Phillips (USFG)		Y

		with handwriting with Attached Projected Profit Analysis	
239.		8/31/98 Job Specific Performance Appraisal -- Deb Bowman	
240.		9/29/98 Letter from Dominiani (DJL) To Phillips (USFG)	Y
241.		10/27/98 Subcontractors (CCI/Ortenzio) Progress Meeting Minutes No. 6	
242.		11/4/98 Project Status/Issues Report	
243.		11/4/98 Project Schedule Milestones	
244.		11/9/98 Letter from Brown (Brown Schultz) To Phillips (CCI)	
245.		11/9/98 Letter from Brown (Brown Schultz) To Phillips (CCI) with handwriting	
246.		11/12/98 Brown Schultz Invoice	
247.		12/2/98 Fax from Dominiani (DJL) To Phillips (USFG)	Y
248.		12/2/98 Bond Approval	Y
249.		12/2/98 Project Status/Issues Report	
250.		12/2/98 Project Schedule Milestones	
251.		12/7/98 Financials Report - Balance Sheet	Y
252.		12/7/98 WIP Schedule Report with Attached 10/98 Detailed Work in Process - General Contracting and Projected Profit Analysis	Y
253.		12/9/98 Project Status/Issues Report	
254.		12/9/98 Project Schedule Milestones	
255.		12/9/98 WIP Schedule Report for 10/31/98	Y
256.		12/9/98 WIP Schedule Report for 6/30/98	Y
257.		12/21/98 Semi-Annual Career Counseling and Evaluation with Attached Job Specific Performance Appraisals and 11/24/98 Memos	
258.		12/22/98 E-Mail from Phillips To Walter, Hussey, and Daily	Y
259.		12/22/98 Dennis T. McGinley Resume	Y
260.		12/23/98 WIP Schedule Report	Y
261.		12/23/98 Letter from Dominiani (DJL) To Phillips (USFG) with Attached 1998 Profit Projections	Y
262.		12/23/98 Memo from Salazar (St. Paul) To Daily and Walter (St. Paul)	Y
263.		12/28/98 Memo from Avery (CCI) To Dominiani (DJL) with Attached Chubb Resume	Y
264.		12/98 Guaranty Agreement, PCIC, \$1.2 Million	Y
265.		12/98 Guaranty Agreement, PCIC, \$1,162,460	

266.	12/31/98 Budget/Time Summary - PCIC		
267.	12/31/98 Summary of Earned Premiums Worksheet - PCIC		
268.	12/31/98 Schedule of Remedial Work Policies - PCIC		
269.	12/31/98 Remedial Work Claim Reserve Calculation - PCIC		
270.	12/31/98 Claims in Course of Settlement Reserve		
271.	12/31/98 and 1997 PCIC Audit Report		
272.	12/31/98 PCIC Modification of Auditors' Report		
273.	12/31/98 Job Specific Performance Appraisal -- Deb Bowman		
274.	12/31/98 Guide for Review of Workpapers Under U.S. Auditing Standards		
275.	1/5/99 Memo from Phillips (USFG) To File, Daily, Hussey, Walter	Y	
276.	1/5/99 CCI Meeting Agenda	Y	
277.	1/7/99 Bond Approval	Y	
278.	1/7/99 Bond Approval Re. State Route 0011-008/U.S. 11/15, PA	Y	
279.	1/11/99 Letter from Merski (Dept. of Army) To CCI		
280.	1/12/99 Letter from Brown to Phillips (PCIC)		
281.	1/27/99 Notice of New Business Re. VCU	Y	
282.	2/3/99 Project Status/Issues Report		
283.	2/3/99 Project Schedule Milestones		
284.	2/10/99 Project Status/Issues Report		
285.	2/10/99 Project Schedule Milestones		
286.	2/17/99 Project Status/Issues Report		
287.	2/17/99 Project Schedule Milestones		
288.	2/18/99 Bond Approval	Y	
289.	2/19/99 State Licensing Priority	Y	
290.	2/25/99 Letter from Phillips (CC) To Schwartz (Dauphin Deposit Bank)		
291.	2/25/99 Letter from Phillips (CC) To Dominiani (D JL)		
292.	3/2/99 WIP Schedule Report	Y	
293.	3/4/99 Financials Report - Income Statement	Y	
294.	3/4/99 Financials Report - Balance Sheet	Y	
295.	3/8/99 PCIC Independent Auditor's Report with Certificate as to Insurers Solvency and Solvency Assessment Schedule for CCI Insurers		

296.		3/9/99 Memorandum from Petrowski To Phillips and Sechrist						
297.		3/22/99 Letter from Gordon (GPW) To PCIC						
298.		3/23/99 Letter from Schwartz (First National Bank) To Phillips (CCI)						
299.		3/30/99 Letter from Bowman (Brown Schultz) To Financial Services Commission						
300.		3/31/99 Job Specific Performance Appraisal -- Deb Bowman						
301.		5/1/99 Specific Discretionary Authority Notice						
302.		5/31/99 Semianual Performance Summary -- Deb Bowman						
303.		6/14/99 Bond Approval Re. VA Listed Barracks						
304.		6/14/99 Bond Approval Re. FBI Academy Renovations						
305.		6/18/99 Semi-Annual Performance Appraisal Memo -- Corrine Rebinski with Attached internal Memos and 12/31/98 Job Specific Performance Appraisals						
306.		6/21/99 Letter from Miller (CCI) To Drunwright (James River) with Fax Cover Sheet to Dominiani and Fax Cover from Dominiani to Phillips (USFG)						
307.		6/23/99 WIP Schedule Report with Attached 3/99 Detailed Work in Process - General Contracting						
308.		6/25/99 WIP Schedule Report with Attached 6/98 Detailed Work in Process - General Contracting						
309.		7/19/99 Letter from Ortenzio (CCI) To Penwell (PCIC)						
310.		7/27/99 Bond Approval Re. PA Turnpike						
311.		8/99 CCI Projections for 1999 and 2000						
312.		8/20/99 Bond Approval Re. State Route 78						
313.		8/20/99 Financials Report - Income Statement						
314.		8/20/99 WIP Summary Report						
315.		8/20/99 Financials Report - Ratios						
316.		8/20/99 Ratio Analysis Report						
317.		8/20/99 Financials Report - Balance Sheet						
318.		8/20/99 Folder Summary Report						
319.		8/20/99 Folder Exceptions Report						
320.		8/30/99 Letter from Dominiani (DJI) To Phillips (USFG) with Fax Cover from Phillips (USFG) To Daily (USFG)						
321.		10/6/99 Letter from Ortenzio (CCI) To Dominiani (DJI) with Attached 2000 Projections and Fax Cover from Salazar (St. Paul) To Walter (St. Paul)						

322.		10/12/99 WIP Schedule Report with Attached 6/99 Detailed Work in Process - General Contracting					Y
323.		10/15/99 Memo from Phillips (St. Paul) To File with Attached 1999/2000 Projections and Fax Cover to Walters (St. Paul)					Y
324.		10/22/99 Fax Cover from Phillips (St. Paul) To Walter (St. Paul) with Attached Agenda for 10/27/99 CCI Meeting					Y
325.		10/28/99 Memo from Phillips (St. Paul) To File with Fax Cover To Walters (St. Paul)					Y
326.		11/30/99 CCI Income Statement					Y
327.		11/30/99 E-Mail from Schumaker To Corriveau, Walter and Silverstein Re. Scott Air Force Base Claim					Y
328.		12/31/99 Job Specific Performance Appraisal -- Deb Bowman					
329.		12/31/99 Job Specific Performance Appraisal -- Semianual Performance Summary -- Corrine Rebinski with attached 12/98 Job Specific Performance Appraisal					
330.		12/31/99 Balance Sheet					
331.		12/31/99 PCIC G/L Detail Trial Balance					
332.		12/31/99 PCIC Summary of Earned Premiums					
333.		12/31/99 PCIC Schedule of Remedial Work Policies					
334.		1/7/00 Letter from Miller (CCI) To Dominiani (DJL)					Y
335.		1/18/00 Letter from Salazar (St. Paul) To Dominiani (DJL)					Y
336.		2/2/00 WIP Schedule Report with Attached 11/99 Work in Process					Y
337.		2/17/00 Fax Cover from Phillips (St. Paul) To Walter (St. Paul) with Attached 12/31/99 In-House Financial Statement/WIP					Y
338.		2/18/00 Letter from Miller (CCI) To Dominiani (DJL)					Y
339.		2/18/00 WIP Schedule Report					Y
340.		3/2/00 Letter from Kazlow (St. Paul) To Ortenzio (CCI)					Y
341.		3/22/00 Acceptance of Tender RE. PA Turnpike					
342.		3/00 Assignment Agreement Re. PA Turnpike					
343.		5/15/00 Takeover Agreement Re. Outlook Pointe Westerville					
344.		5/00 Collateral Assignment of Takeover Agreement Re. Outlook Pointe Westerville					
345.		7/11/00 Verification of Brown					Y
346.		8/15/00 Quarterly Overall Performance Review -- Corrine					

	Rebinski with Attached 7/6/00 Semi-Annual Performance Appraisal Memo
347.	8/13/02 Fax from Brenner to Carson (Swartz, Campbell)
348.	8/20/02 Telecon with Brown, McCarron, Carson, Brenner, and Jefferis
349.	8/21/02 Letter from Brenner to McCarron with Exhibits
350.	Ortenzio Personal Financial Statement
351.	The Brenner Group Website Content, Printed 4/4/03
352.	Curriculum Vitae of Bruce J. Brown
353.	Resumes of Ortenzio, Miller, Barber, Heck, Powers, Phillips, McAninch, Morgan, Sechrist, Granza
354.	Handwritten Notes
355.	Handwritten Notes